

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PHILIP FEI, on behalf of himself and classes  
of those similarly situated,

Plaintiff,

v.

WESTLB AG,

Defendant.

Index No.: 07 Civ. 8785 (HB) (FM)

**NOTICE OF CROSS-MOTION**

PLEASE TAKE NOTICE THAT, upon the affirmation of Jason Habinsky and accompanying exhibits, executed May 29, 2008, the Memorandum of Law in support hereof, dated May 30, 2008, and the prior pleadings herein, defendant WestLB AG, by its undersigned attorneys, moves this Court for a Protective Order forbidding Plaintiff Philip Fei from deposing Richard Greenberg, a partner in the law firm of Jackson Lewis, and Gregory Leahy, defendant WestLB's former in-house counsel.

Dated: May 30, 2008  
New York, New York

HUGHES HUBBARD & REED LLP

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